

## 25.3 SNAP E&T ACTIVITIES

All clients must complete a Personal Responsibility Plan (PRP) prior to placement in an activity. The activities available for placement are listed below. Clients must be placed in existing activities provided at no charge to the individual, or payment must be provided through other funding sources such as WIB or PELL grants, etc.

### A. JOB SEARCH ACTIVITY

Job Search is a qualifying ABAWD activity only when it immediately precedes a qualifying placement. A qualifying placement is one which meets participation requirements for a non-exempt ABAWD.

Individuals who are determined to be job ready or individuals who have satisfactorily completed another program activity are placed in this activity. This activity consists of counseling on an as needed basis. The duration of this activity must not exceed one month.

Participants are required to make a pre-determined number of employer contacts in a month, not to exceed 12 per month. Job contacts must be recorded on the Job Search Employer Contact Verification Form, DFA-WVW-25, and returned to the SNAP E&T Worker at the end of the Job Search period. Contacts are verified on a random sample basis. When feasible, one contact should be with Job Service to register for work and to obtain WIB and WOTC certification. If the required contacts have not been made or if other questions arise, an interview is scheduled to determine good cause or to discuss other concerns when the DFA-WVW-25 is not returned.

Participants are to be paid a \$25 transportation reimbursement for the month's of activity. Payment will be made prior to, or when Job Search begins, and must be taken into consideration when scheduling the Job Search activity.

It may not always be feasible for a participant to complete the required number of contacts. The SNAP E&T Worker must determine on a case by case basis if good cause exists for not completing the required number of contacts. An example of good cause is a lack of employers within a reasonable distance to the individual. Also, the individual must possess the skills normally required by the local employers.

When the Worker determines that an insufficient number of employers are available, the individual satisfies the requirements for Job Search if he/she has contacted the available employers and attended the scheduled classroom training.

## B. EDUCATIONAL ACTIVITIES

This activity includes placement in existing structured activities that such as High School, GED, Adult Basic Education (ABE), Literacy, English as a Second Language and post secondary education. High School, GED, English as a second language and Adult Basic Education classes are operated by the County Board of Education. In some counties, private not-for-profit groups offer this type of activity with Workforce Investment Board (WIB) funding. Individuals in college and other post-secondary activities must use private funds, existing grants such as PELL, and loans to cover the cost of tuition, books, and fees. Skills training may be paid after all other resources are exhausted for vocational training not including college.

Individuals under the age of 30 without a High School Diploma or GED are required to enter remedial or secondary education activities if they are not working part time or involved in another activity. Individuals who are already in college courses are expected to continue participating or, as required, participate in another activity. Individuals are required to participate a minimum of six hours per week or 24 hours of classroom time in a four week period.

Only those scheduled to attend classes at least 24 hours each month will receive reimbursement for transportation. Non-exempt ABAWD individuals who attend class less than 20 hours a week are required to participate in another activity to meet the 20-hour participation requirement.

The SNAP E&T Worker must refer individuals to the appropriate program, such as ABE, GED, or post-secondary, and must monitor progress on a monthly basis. A time sheet, DFA-TS-12, must be completed for each month's participation and signed by each service provider. The SNAP E&T Worker must also work with participants to help eliminate barriers to participation by making referrals to other services available in the community. The SNAP E&T Worker must work with each service provider to determine the level of progress being made. If satisfactory progress is not made the client may be subject to a penalty. See Section 13.6.

Individuals who participate in these activities are expected to improve basic functioning levels and/or obtain a GED. Upon completion, individuals may be required to enter either the Job Skills/Vocational Training or EIP.

In order to meet the ABAWD participation requirement, the individual must attend the educational facility 20 hours per week. Assignment to an additional component may be necessary to meet the 20 hour requirement if the educational component is less than 20 hours per week.

**EXAMPLE:** Twelve hours per week are available in the educational component. The participant may be placed into an EIP for at least 8 hours a week in order to meet the 20-hour participation requirement.

Participants are paid a \$25 transportation reimbursement for each month of participation.

The following lists educational activities that may meet an individual's work requirement.

1. Literacy Program

When the client cannot read, he may be placed in a Literacy Program. To qualify for such placement, the individual must test at or below standards set by the literacy program.

2. High School

The student must adhere to the established attendance policy of the institution.

When the individual is no longer eligible to be in the school system, or placing him back in the school system is inappropriate, he must be placed in Adult Basic Education (ABE), vocational training or an alternative school setting.

3. English As A Second Language

Those adults who cannot read, write, and/or speak English, may receive education in English language skills. This is considered ABE/GED for coding purposes.

4. Adult Basic Education (ABE)

ABE includes training in basic skills. It may also be used to help prepare for the GED test.

## 5. College

**NOTE:** Student policy applies. See Section 9.1,A.

Attending undergraduate college classes part-time may meet the work requirement for an individual if the 20 hours per week requirement is met. Otherwise, hours spent in class may help meet the requirement. If the 20-hour requirement is not met, the individual may be subject to a penalty. No hours of credit are given for study time.

Some undergraduate courses require that students be placed in an unpaid work environment. Such undergraduate placements may also be used to meet the work requirement. These placements include, but are not limited to: student teaching, internships, clinical work assignments and unpaid work experience. When the student does not participate in such activities for a sufficient number of hours to meet his participation requirement, the individual must also participate in another activity.

**NOTE:** Participation in College Work Study is considered employment for coding purposes.

A release of information form may be used to obtain information about a client's participation in education from institutions and other education activity providers. The form authorizes the SNAP E&T Worker to request such information.

The form must be read and explained to the client prior to a specific placement or requirement. The form is signed by the client at the time the SNAP E&T Worker needs to obtain specific information. After completion, the form is filed in the case record.

A transportation payment of \$25 may be made for each month of participation.

## C. JOB SKILLS/VOCATIONAL TRAINING

Jobs Skills/Vocational Training enables individuals to acquire the necessary knowledge and skills to compete in a specific occupation. This component may only be used when the training is likely to lead to employment. This activity is provided through existing resources available in the community on a non-reimbursable basis, until the resources have been exhausted. This activity is for non-exempt ABAWD SNAP requirements only.

This training must be preparation for a specific occupation and conducted by an instructor in a non-work site or classroom setting. Entry into this activity is selective and training is authorized only for programs that can be completed in one year or less.

**NOTE:** Exceptions may be made by DFA Policy Unit.

Participants enrolled in Vocational Training are required to participate a minimum of 80 hours per month. The Vocational Training component is used to train participants in specific job skills for jobs that exist in the local labor market area. Participants in need of skill training must be referred to available vocational training schools, WIB sponsors and industrial training programs that provide the training free to the individual. The individual may be referred to a facility that charges a fee, only after it is determined that cost free training is not available.

The SNAP E&T Worker refers suitable candidates to Vocational Training. Attendance and progress must be reported on a monthly progress report, DFA-TS-12, completed by the vocational training facility. The SNAP E&T Worker must monitor and review the progress on a monthly basis. Vocational Training will vary according to training availability and the labor market needs of a particular area.

Individuals who have obtained a GED or certification to become employed in a particular occupation, or to learn a skill in order to become employable, are referred to Vocational Training facilities operated on the local level by the Board of Education and the State Board of Education Bureau of Vocational Education.

The SNAP E&T Worker must determine who should be referred to outside sources for training during the assessment process, See Section 25.4, and the development of the Personal Responsibility Plan. Referrals are made to WIB for certification and to specific programs located on the local level. The SNAP E&T Worker must monitor the attendance sheets, DFA-TS-12, monthly. The SNAP E&T Worker must maintain contact with the participant and service provider to insure satisfactory progress is being made and to help eliminate barriers when needed. Individuals who fail to meet the required 80 hours cannot be considered as making satisfactory progress, unless they are also in another component and the total hours of participation equal 80 or more monthly.

Each participant receives a \$25 transportation reimbursement for each month of participation.

1. Placement Criteria

An individual, who is determined to have the ability to complete the course work and meets the entrance requirements, may participate when:

## SNAP E&amp;T Activities &amp; Requirements

- The goal is to enter an occupation that requires completion of a vocational course prior to employment; or
- Has no job skills, obsolete or non-marketable skills, and must be retrained to find employment; or
- Does not have a High School Diploma/GED, and the skill training has been identified as an alternative which will lead to employment.

Participation hours for Job Skills are governed by the Fair Labor Standards Act (FLSA). The maximum monthly participation obligation is determined by dividing the amount of SNAP benefits by either of the state or federal minimum wage, whichever is higher.

Participants are deemed to have met the required number of hours in the component if they participate for the maximum number of hours permitted by FLSA.

## 2. Placement Standards

The training institution and instructor must meet the licensing and certification standards of the appropriate governing agency. Unlicensed or uncertified instructors are not approved for training when licensing or certification standards exist.

## 3. Contracts

Participants must be placed into training positions on a no-cost basis, if such positions are available through WIB, the Department of Education, Veterans Administration and other providers, before additional training positions may be considered. These providers are not reimbursed unless all existing training positions have been filled.

The SNAP E&T Worker may write contracts for individuals, without DFA approval, for an amount not exceeding \$600. Individual contracts exceeding \$600 must be approved by DFA.

The SNAP E&T Worker uses the Training Agreement, DFA-TA-34.

## 4. Payment Limitations

Payments are limited to tuition, books, supplies and expenses associated with completing the course of study. Costs for medical procedures, such as Hepatitis B vaccines or physical exams, are not included. There is a limit of \$600 per individual contract. This limit cannot be exceeded without approval from DFA. To obtain approval, a written request must be

submitted to the Director of DFA and include the client's name, address, SSN, name of the training facility and the occupation for which training is sought. The request must also include the usual pay rate for the occupation, as well as the current employment prospects and labor demands.

A transportation payment of \$25 may be made for each month of participation.

#### D. COMMUNITY SERVICES PROGRAM

This program is for non-exempt ABAWD SNAP recipients only. These individuals must be placed with agencies described below in order to meet the work requirement. The primary purpose of Community Service is to provide work experience and training to assist a client who has limited work experience, is under-employed or has no immediate employment opportunities.

Placements are only made with private not-for-profit agencies or public agencies. The SNAP E&T Worker is responsible for approving all work positions and for collecting monthly time sheets for each participant.

Each participant receives a \$25 transportation reimbursement for each month of participation.

Participation hours for Community Services are governed by the Fair Labor Standards Act (FLSA). The maximum monthly participation obligation is determined by dividing the amount of SNAP benefits by either of the state or federal minimum wage, whichever is higher.

Participants are deemed to have met the required number of hours in the component if they participate for the maximum number of hours permitted by FLSA.

The SNAP E&T Worker must work closely with the local WV WORKS staff in making Community Service Placements. An ABAWD recipient can not be placed with an existing CWEP sponsor.

##### 1. Who May Be A Community Service Sponsor

Community Service sponsors are limited to public agencies, such as federal, local, state and not-for profit employers. It is limited to public services projects in fields such as health, social services, environmental protection, education, urban and rural development and re-development, welfare, recreation, public activities, public safety and child care.

## 2. Requirements Of The Sponsor

The Community Services Sponsor must meet the following requirements:

- Provide the client with guidance and supervision necessary to participate in the work experience project;
- Provide safety equipment, special clothing and tools needed to perform the assigned duties;
- Assume the cost of any required pre-employment medical examinations;
- The agency should provide medical coverage in the event the individual is injured while volunteering at the work site; and
- Not schedule clients to work split shifts during the work period.

## E. EMPLOYMENT

The first priority of the SNAP E&T Program is placement of the individual into full-time unsubsidized employment. When this is not possible, part-time unsubsidized, part-time or full-time subsidized employment and other activities can be explored.

The client's entry into employment may be the result of job development by the SNAP E&T Worker, efforts of other employment agencies, or the result of the client's own efforts. If the number of hours of employment does not meet the client's ABAWD work requirement, additional activities are required. Hours of employment count toward the client's ABAWD work requirement during each month the client receives SNAP benefits.

Items 1 and 2 below define unsubsidized and subsidized employment and provide other necessary information.

### 1. Unsubsidized Employment

Unsubsidized employment is when earnings are provided by an employer who does not receive a subsidy for the creation and maintenance of the employment position.

**NOTE:** Any tax credits received by the employer are not considered subsidies.

#### a. Displacement/Replacement

There is no consideration of the displacement of other employees when the client is placed in unsubsidized employment.

b. Employment Standards

Unsubsidized employment must provide the starting wage at or above the applicable state or federal minimum wage. When employment does not meet this criterion, it is considered good cause for refusing or failing to take action to secure the employment.

2. Subsidized Employment

Subsidized employment is work with earnings provided by an employer who receives a subsidy for the creation and maintenance of the employment position. To place an individual in subsidized employment, the displacement/replacement policy and the employment standards below apply.

a. Displacement/Replacement

Placement of SNAP E&T clients into subsidized employment and on-the-job training must not dislocate, displace, or otherwise have an adverse effect on an employer's regular labor force.

The following requirements apply:

- All regular employees of this employer must not suffer a reduction in work hours, overtime, fringe benefits or the opportunity for advancement.
- The employer must not refuse to hire a regular employee in lieu of a SNAP E&T placement.
- The employer cannot reduce the normal labor force positions by increasing open positions with SNAP E&T placements.
- SNAP E&T placements must not cause a relocation of workers from one geographical area to another.
- The regular employees at a work site must be informed that SNAP E&T placements may not cause any dislocation and that they may file a grievance if they feel their job has been adversely affected by SNAP E&T placements.
- SNAP E&T placements cannot be made with employers involved in any abnormal labor condition, such as a strike or lockout.

b. Employment Standards

Subsidized employment must meet the employment standards listed below. When the subsidized employment does not meet all of the criteria, the client has good cause for refusing or failing to accept the position.

- The employer must not be in violation of the Civil Rights Act, the Americans with Disabilities Act or any other law governing the equal treatment of employees in the workplace.
- The employment must not impair existing contracts for service or collective bargaining.
- The starting wage must be at or above the applicable state or federal minimum wage.
- The recipient is not eligible for a \$25 transportation payment.

F. EMPLOYER INCENTIVE PROGRAM (EIP)

EIP provides participants hired by either public or private employers, with subsidized training and employment. Prior to the placement, the employer must commit to retain the employee after the completion of the contract. It is a hire-first program with training paid for by the Department.

EIP provides the participants with structured skills training, an opportunity to improve skill levels, and provides the marginally employable with an opportunity to become employed. The expected outcome at the conclusion of the contract is unsubsidized employment.

1. Who May Be An EIP Employer

Any employer, including a public agency, not-for-profit organization, and private business which is licensed to conduct business in West Virginia is eligible to be an EIP employer, provided all business tax payments are current. In addition, the employer must agree to the requirements specified below.

## 2. Employer Requirements

The employer must meet the following requirements:

- The employer must guarantee appropriate standards for employment.
- The employer must guarantee there will be no displacement/replacement.
- EIP placements must not provide more than 50% of the employer's labor force.
- The contract must be for at least 20 hours per week.
- Out-of-state training sites must be within 15 miles of the WV border.
- The employer must make a commitment to retain the client at the conclusion of the contract.
- The employment must be permanent and not on a seasonal basis.
- The number of EIP training hours are based upon the starting wage as shown:

Beginning Hourly Wage	EIP Training Hours
\$5.99 or less	200
\$6.00 through \$6.99	300
\$7.00 through \$7.99	400
\$8.00 through \$8.99	500
\$9.00 or more	600

Contracts are not written for the following:

- Employers in a highly mobile industry
- Contracts are not written for occupations that require certification and/or licensure, such as for a CNA, LPN or RN, if the schooling/training results in a certificate or license.
- Occupations requiring minimal training
- A transportation payment of \$25 may be made for each month of participation.

**G. DRIVER'S EDUCATION**

This program is for non-exempt ABAWD SNAP recipients only. Individuals, without a driver's license, may be placed in a class to learn how to drive. The instructor must be a certified driver's education instructor. The class must be designed to teach driving skills for beginning drivers. This component does not include classes designed to reduce driver's "points" received for traffic violations, nor does it include regaining a driver's license after losing it for a driving violation.

A transportation payment of \$25 may be made for each month of participation. A tuition payment may be made once during the lifetime of the participant. The tuition payment is limited to no more than \$350.